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Attorneys for Defendants Black & Decker
(U.S.) Inc. erroneously named and served
as DeWalt Industrial Tool Co.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

TUBO GIPSON,
Plaintiff,
v.
BLACK & DECKER (U.S.) INC.,
Defendant.

Case No. 3:16-CV-03114-LB
Assigned to: Hon. Laurel Beeler
**STIPULATION OF DISMISSAL
WITH PREJUDICE**

TO THE HONORABLE JUDGE OF SAID COURT:

NOW INTO COURT, through undersigned counsel, comes Defendant Black & Decker (U.S.) Inc., and Plaintiff, Tubo Gipson, who, pursuant to the provisions of Federal Rule 41(a)(1), hereby give notice of the Parties agreed stipulation of dismissal, with prejudice, of all claims asserted against Defendant Black & Decker (U.S.) Inc., in the above-captioned Complaint previously filed by Plaintiff, Tubo Gipson in the United States District Court for the Northern District of California.

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1 **WHEREFORE PREMISES CONSIDERED**, the undersigned counsel
2 respectfully request that the Court grant this their Stipulation of Dismissal With
3 Prejudice and that each party bear its own costs incurred.

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5 Dated: August , 2017

LESTER & CANTRELL, LLP

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7 By: _____
8 Kevin Crisp
9 Attorney for Defendant
10 BLACK & DECKER (U.S.) INC.

11 Dated: August , 2017

**LAW OFFICE OF NIKOLAUS W.
REED**

12

13

14 By: _____
15 Nikolaus W. Reed
16 135 10th Street
17 San Francisco, CA 94103
18 Attorney for Plaintiff Tubo
19 Gipson

20 Dated: August

QUIRK LAW GROUP, APC

21

22 By: _____
23 Logan Lambert Quirk
24 1295 W. Sunset Blvd.
25 Los Angeles, CA 90026
26 Attorney for Plaintiff Tubo
27 Gipson

28 DATED: August 18, 2017

